

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

KEVIN TORGERSON,

Plaintiff,

v.

1:21-cv-00204-DHU-LF

CHRISTOPHER STARR,

Defendant.

DEFENDANT'S DISCLOSURE OF EXPERT WITNESS

COMES NOW Defendant Starr, by and through his counsel of record Law Office of Jonlyn M. Martinez, LLC, and hereby discloses the following expert witness who has been retained or specially employed to provide expert testimony in this case:

John (Jack) Ryan
5235 Decatur Blvd
Indianapolis, Indiana 46241
(800) 365-0119

Mr. Ryan's written report containing a statement of his opinions and the basis and reasons thereof, as well as a list of the data or other information considered by him in forming such opinions is attached hereto as well as his Curriculum Vitae and his fee schedule.

The Defendants reserve the right to supplement this disclosure in accordance with the Federal Rules of Civil Procedure and also to subsequently offer expert testimony from any witness qualified as an expert at trial by knowledge, skill, experience or education or that may be necessary for purposes of impeachment or rebuttal.

Respectfully Submitted:

LAW OFFICE OF JONLYN M. MARTINEZ, LLC

By: /s/ *Jonlyn M. Martinez*
JONLYN M. MARTINEZ
Attorney for County Defendants
P.O. Box 1805
Albuquerque, NM 87103-1805
P: (505) 247-9488
jonlyn@jmartinezlawn.net

I hereby certify that a copy of the foregoing
was served via CM/ECF on
March 1, 2022 to all counsel of record:

/s/ *Jonlyn M. Martinez*